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PROPOSED ATTORNEYS FOR
DEBTOR-IN-POSSESSION

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF WYOMING**

In re:)	
)	Case No. 24-20138
BOTW HOLDINGS, LLC)	
)	Chapter 11 (Subchapter V)
)	

In re:)	
)	Case No. 24-20141
HUSKEMAW OPTICS, LLC)	
)	Chapter 11 (Subchapter V)
)	

In re:)	
)	Case No. 24-20142
BEST OF THE WEST)	
PRODUCTIONS, LLC)	Chapter 11 (Subchapter V)
)	
Debtors.)	

MOTION FOR EXPEDITED HEARING ON FIRST DAY MOTIONS

BOTW Holdings, LLC (“Holdings”), Huskemaw Optics, LLC (“Huskemaw”), and Best of the West Productions, LLC (“Productions”) (collectively the “Debtors”), through undersigned proposed counsel, and pursuant to Local Rule 2081-1, hereby file this *Motion*

for Expedited Hearing on First Day Motions (the “Motion”) and ask the Court to set an expedited hearing on the following pending motions:

- A. Motion for Entry of Interim and Final Orders (A) Approving Adequate Assurance of Payment to Utility Providers, (B) Establishing Procedures for Resolving Objections by Utility Providers, (C) Prohibiting Utility Providers from Discontinuing, Altering or Refusing Service, and (D) Granting Related Relief*
- B. Motion for Entry of Order: (I) Authorizing, but not Directing, the Debtors to (A) Pay Prepetition Employee Wages, Salaries and Other Compensation (B) Continue Employee Benefits Programs and (II) Granting Related Relief*

(collectively, the “First Day Motions”).

In support of this Motion, Debtors rely on the *Declaration of Chase Myers in Support of Employee Wage Motion and Utilities Motion*, which is attached hereto and incorporated herein by reference (the “Declaration”). In further support of this Motion, Debtors state as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Wyoming (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory bases for the relief requested herein are 11 U.S.C. § 105(a) and Local Rule 2081-1.

INTRODUCTION

3. On April 19, 2024, Holdings separately filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code

4. On April 21, 2024, Huskemaw separately filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code

5. On April 22, 2024, Productions separately filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

6. The Debtors are authorized to operate their business and manage their properties as debtors-in-possession under §§ 1107(a) and 1108.

7. No creditors' committee is appointed in the chapter 11 cases by the Office of the United States Trustee, nor has any trustee or examiner been requested or appointed.

8. The Debtors are Wyoming limited liability companies based in Cody, Wyoming. The Debtors are involved in the outdoor industry, having evolved from their original focus on outdoor industry video production company to offering long-range shooting systems.

9. Debtors believe that the relief requested herein is necessary to ensure uninterrupted company operations.

RELIEF REQUESTED

10. By this Motion, the Debtors request entry of an order pursuant to Bankruptcy Code section 105(a) and Local Rules 2081-1 setting an expedited hearing on the Debtors' First Day Motions (the "First Day Hearing").

BASIS FOR RELIEF REQUESTED

11. Pursuant to Local Rule 2081-1, a chapter 11 debtor may request consideration for entry of an order for initial motions by filing a motion for an expedited hearing and motions for the requested relief.

12. Here, the First Day Motions have been filed. Further, the First Day Motions state, with particularity, the grounds supporting the request for an expedited hearing thereon as well as for the relief requested therein. In short, timely resolution of the relief requested in the First Day Motions is critical to Debtors' continued operation and value.

13. Debtors ask that the Court approve the following procedure for notice and service. Debtors will serve the First Day Motions and proposed orders, the First Day Declaration, and any order granting this Motion and setting the First Day Hearing by overnight mail to the Debtors' Limited Service List on or before May 1, 2024. The Debtors shall file a certificate of service demonstrating the same within two (2) business day thereafter.

14. This procedure will provide adequate notice to the Debtors' Limited Service List, informing them of both the hearing set on the First Day Motions and the relief requested therein.

CONCLUSION

WHEREFORE, Debtors ask the Court to grant the relief requested herein.

Dated: Cheyenne, Wyoming
April 29, 2024

MARKUS WILLIAMS YOUNG &
HUNSICKER LLC

By: /s/ Bradley T. Hunsicker

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*Proposed Counsel for the
Debtors-In-Possession*

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of April, 2024, I caused a true and correct copy of the foregoing **MOTION FOR EXPEDITED HEARING ON FIRST DAY MOTIONS** to be served, electronically, upon the parties indicated below via the Court's CM/ECF system:

Daniel J. Morse
Assistant U.S. Trustee
308 West 21st Street, Room 203
Cheyenne, WY 82001
daniel.j.morse@usdoj.gov

/s/ Bradley T. Hunsicker
Bradley T. Hunsicker